

February 13, 2003

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>
>
> Honorable Michael Powell
> Chairman
> Federal Communications Commission 445 12th Street, SW Washington, DC
> 20544
>
> RE: CC Docket No. 01-338, Review of the Section 251 Unbundling
> Obligations of Incumbent Local Exchange Carriers
>
>
> Dear Chairman Powell:
>
> It's time for the FCC to dismantle the economically irrational
> facilities unbundling rules that have devastated the
> telecommunications industry and the high-tech manufacturing sector.
> Over the past 3 years over 500,000 jobs have been lost, more than \$1.7
> trillion in stock market capitalization has evaporated, and capital
> spending has been severely curtailed.
>
> The FCC should create a national framework governing the telecom
> industry that incents facilities investment, and thus, creates an
> environment allowing for long-term, sustainable competition. On a
> national basis, the FCC should eliminate unbundled switching and the
> unbundled element platform (UNE-P). The FCC should eliminate other
> unbundling requirements where facilities-based competition has
> developed. For example, competition in the market for high capacity
> loops and transport is prolific in many areas of the country.
> Therefore, current unbundling requirements should be lifted.
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> The FCC should not extend unbundling requirements to broadband
> facilities. Freeing broadband investment from costly unbundling
> requirements will incent investment and deployment of valuable new
> technologies nationwide. The products and services provided by
> broadband technologies will add significant value, efficiencies and
> capabilities to small and large businesses across the U.S. A recent
> study released by the Progress and Freedom Foundation found that
> eliminating the current unbundling regime would result in the creation
> of 1.115 million new jobs in the communications sector and an increase
> in capital spending of \$169.5 billion over the next five years.
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> I urge the FCC to support eliminating the current and harmful
> unbundling regime in favor of a new paradigm encouraging sustainable
> competition and facilities investment.
>
> Sincerely,

Mark Piercy
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>
>
> cc:
>
> Commissioner Abernathy

- > Commission Adelstein
- > Commissioner Martin
- > Commissioner Copps